APPENDIX A. SCOPING COMMENTS SUMMARY AND DOE RESPONSES

Following is a summary of the comments recorded in the October 17 and 18, 2000, *U.S. Department of Energy, Environmental Assessment, Energy Technology Engineering Center, Public Scoping Meetings, Transcript of Proceedings* and written comments received from the U.S. Environmental Protection Agency (EPA). Brief responses by the U.S. Department of Energy (DOE) to these comments are provided. No other comments were received during the comment period that extended from September 15–October 30, 2000.

1. **Comment on Groundwater Plumes:** The groundwater trichloroethene (TCE) plume that is being evaluated does not include the larger plumes for the entire Santa Susana Field Laboratory (SSFL) site. Are these plumes a part of the site groundwater cleanup activities? Are the three plumes connected to the larger plume at SSFL?

   Response:. Cleanup of chemical contamination is being addressed in accordance with the SSFL site-wide Resource Conservation and Recovery Act (RCRA) corrective action program. With respect to the RCRA process, DOE is only responsible for the groundwater plumes that were created as a result of DOE-funded activities. All of the ETEC groundwater plumes are being remediated at this time. The National Aeronautics and Space Administration (NASA), the Department of Defense, and Boeing are responsible for the larger plumes at SSFL. These are separate from the ETEC plumes and are being cleaned up using separate wells and treatment systems in accordance with RCRA permit requirements.

2. **Comment on Cleanup Standards:** It is not clear what standard DOE will use in cleanup of the site. It was recommended that DOE use the EPA standards for residential use as the appropriate cleanup standards. DOE should use rural residential standards rather than residential standards.

   Response: DOE's preferred alternative is to use the cleanup standard approved by DOE, which are consistent with EPA's CERCLA standards, and the California Department of Health Services, Radiologic Health Branch. Under this alternative, DOE would clean up the site such that a resident on the site would be exposed to no more than an additional 15 millirem annually and would experience an additional lifetime cancer risk that would not exceed 3×10^{-4}. This alternative is equivalent to the rural residential scenario. With implementation of the ALARA principle, DOE will be within the CERCLA range. DOE also analyzed an alternative under which the site would be cleaned up to a level such that a resident on the site would be exposed to no more than an additional lifetime cancer risk of 1×10^{-6}. This EA also considers the No Action Alternative of no further cleanup and securing the site.

3. **Comment on National Environmental Policy Act (NEPA) Compliance:** DOE should do an environmental impact statement (EIS) rather than an EA because there is more opportunity for public involvement. Past cleanup activities at the ETEC site have been conducted without proper NEPA documentation.

   Response: DOE believes that an EA is the appropriate level of NEPA documentation for cleanup and closure of ETEC. The purpose of an EA is to determine whether the impacts of a proposal may be significant. Based on past experience, DOE concluded that there was no indication that the impacts of the proposed action or alternative would have significant environmental impacts. With respect to public involvement, DOE issued a notice of intent to prepare the EA, conducted 2 days of

scoping meetings, and encouraged the submission of scoping comments. The EA is being put out for public review for a period of 30 days. Thus, the public involvement activities for this EA are similar to that used for the preparation of EISs.

Following the completion of the EA, DOE will evaluate and determine if there are significant impacts. If there are significant impacts, then DOE will prepare an EIS. If no significant impacts are identified following evaluation and considering mitigation, then DOE will conclude the process with a finding of no significant impact.

4. **Comment on Characterization:** Characterization activities have not been completed for the ETEC site. DOE is basing their evaluation on information from Rocketdyne studies that have not been updated in several years. NEPA evaluation should be delayed until characterization is complete.

   The EPA should complete an independent evaluation. The evaluation should include a detailed sampling plan that covers a wide range of sample sites, sample depths, and analyses for radioactive and hazardous materials. Previously released facility sites should be characterized to assure that they comply with current standards.

   Response: Extensive radiological characterization has been conducted at the ETEC site. Additional post-remediation characterization would be performed under the proposed action to verify that cleanup goals have been met. Additional sampling and analysis would also be performed at any sites suspected to be contaminated. Characterization of chemical contamination has also been performed at ETEC. Additional chemical characterization for the entire SSFL, including the ETEC site, is under way pursuant to the RCRA corrective action process. To date, EPA has validated release surveys for eight former radiological facilities. DOE also plans to support an independent verification survey for the site.

5. **Comment on Waste Management:** Waste material and temporary facilities from restoration activities have been shipped to waste sites and donated to the public without proper characterization.

   Response: All materials from radiological facilities are properly characterized, surveyed, evaluated, and approved for shipment to disposal or recycling facilities. All of these activities are performed under regulatory oversight. Follow-up surveys that were conducted of nonradiological office buildings have not indicated any contamination above the limits established by state and federal regulations.

6. **Comment on SSFL Cleanup Responsibilities:** Why is DOE only evaluating the ETEC site? DOE should evaluate the entire SSFL site for radiological contamination and hazardous material contamination. What area of SSFL is DOE responsible for, and what is being covered in the ETEC EA? Who is responsible for NEPA determination for the SSFL?

   Response: DOE is responsible only for DOE-owned facilities and DOE-funded operations at SSFL. Therefore, this EA only covers activities at ETEC and contamination releases from DOE operations at ETEC that may extend beyond its boundaries. The SSFL site is the responsibility of NASA, the Department of Defense, and the Boeing Company, which are responsible for management and funding of activities for their respective areas of the SSFL. The State of California will conduct an assessment and prepare an environmental impact report under the California Environmental Quality Act for the chemical contamination at SSFL, including the ETEC site. The DOE is only responsible for NEPA determination of ETEC.

7. **Comment on Alternatives:** DOE should evaluate several alternatives as part of the EA. Issues such as contamination in the bedrock and groundwater contamination should be evaluated.

   Response: This EA evaluates an alternative that would reduce the additional lifetime cancer risk to the maximally exposed individual residing on the ETEC site to 1×10^{-6}. This would involve removing substantial amounts of soil, in some cases down to bedrock. Groundwater contamination is being evaluated under RCRA.

8. **Comment on Notification:** How are people being notified of these meetings?

   Response: Over 1,600 mailings were sent out informing state and federal agencies and the public of the scoping meetings. Additionally, the meetings were announced in public media.

9. **Comment on Models and Assumptions:** Assumptions used for input into models should be as conservative as possible.

   Response: All risk models and input parameters are subject to review by regulatory agencies. Results are generally considered to be very conservative. Assumptions used for environmental effect analyses follow state and federal laws and regulations. Parameters used in risk models that are known, including contamination concentrations, are input as accurately as possible, with a bias toward being conservative. Parameters that cannot be accurately determined are estimated based on known information and regulatory guidance. The model input parameters are often selected to represent conservative values (i.e., likely to overestimate risk). However, sometimes a parameter value selected to address an uncertainty may not be conservative.

10. **Comment on Access Control:** Access to the site should be controlled so the public cannot be exposed to any remaining contamination.

    Response: Access to the site is currently being controlled by Rocketdyne.DOE cannot determine the long-term use of the site. Rocketdyne has no plans to release the site for public use anytime in the near future and will maintain control of the site.

11. **Comment on Sodium Reactor Experiment Meltdown Building:** What is the status of the building that housed a reactor meltdown in 1959?

    Response: All radioactive material was removed in the 1960s and 1970s. The facility was decommissioned and decontaminated in the late 1970s and early 1980s. It was released for unrestricted use in 1985. The building was torn down in 1999.

12. **Comment on Soil Contamination:** What is the status of the hazardous and radioactive soil contamination, how is it being shipped, and where is it being shipped?

    Response: Information on radioactive soil contamination is addressed in Chapters 2 through 4 of this EA. Hazardous soil contamination is being addressed under RCRA.

13. **Comment on Sodium Burn Pit:** The status of the remediation of the sodium burn pit is not clear. There should be a discussion of the sodium burn pit in the EA.

    Response: The Former Sodium Disposal Facility (FSDF) originally consisted of a rectangular, concrete-lined pit filled with water, two water-filled basins, and a small building (4886). The facility began operations in the 1950s and ceased operations in 1977. During operations, various components

were opened to expose sodium and a sodium potassium alloy, washed with water, and often placed in the ponds to ensure complete reaction (burning) of the sodium. The items were then retrieved and disposed of offsite. Some components containing radioactive material were inadvertently placed in the FSDF. In 1992, the California Department of Toxic Substances Control and the California Regional Water Quality Control Board approved the FSDF Closure Plan, and DOE issued a categorical exclusion under NEPA for cleanup of the facility. In July 1992, soil excavation was initiated. All radiological and sodium components and all radioactive soil were removed by 1995 and the California Department of Health Services issued a release for unrestricted use with respect to radiological contamination in May 1998. The site is designated as a Solid Waste Management Unit under RCRA, and final verification that no chemical contamination poses a risk to human health or the environment will be addressed in the RCRA corrective action process, independently from the decisions made based on this EA. The Department of Toxic Substances Control is also preparing an Environmental Impact Report that addresses chemical contamination at all of SSFL.

14. **Comment on Evaluating Past Actions:** Why are past cleanup activities not being addressed in this EA?

    Response: Past cleanup activities are not addressed in the EA because those activities are complete and are not the subject of DOE decisionmaking. Alternative 2 does address the additional soil remediation that would be required to meet the 1×10^{-6} cleanup standard.

15. **Comment on Fire Accident Scenario:** DOE should evaluate a brush fire and the potential for release of hazardous and radioactive materials due to such a fire.

    Response: The potential impacts of a brush fire at ETEC are addressed in Chapter 4 of this EA.

16. **Comments from the EPA:**

    a. "**Cleanup Levels:** We suggest DOE use this EA process as an opportunity to ask for public comment regarding soil and water cleanup levels and to explain to the public the process that will be used to select the cleanup levels. This would ideally involve an open process that is similar to the process used to select chemical cleanup levels under RCRA; i.e., EPA and DOE ask for public comment, hold a public meeting to explain the proposed levels and obtain comments, and then respond to the comments and select the remedy (including cleanup levels)."

    b. "**Site Characterization:** The EA is currently limited to the 90 acres of ETEC. There are several other areas that should be included in the assessment: 1) Leach Fields attached to former nuclear facilities, 2) Areas (if any) that have not been formally released if decontamination and decommissioning have already occurred."

    c. "**Unknown Areas of Contamination:** In the event that DOE suspects a building or area (beyond the 3 identified in the EA) that may be contaminated, we would like the EA to address the mechanism by which DOE will notify the regulatory agencies and the public. Further, if an area is discovered to actually be contaminated, we would like the EA to address how DOE will involve the regulatory agencies and the community in its decision-making process."

    d. "**Remedy Costs:** We expect DOE to share remedy cost figures with the community as part of the alternatives analysis portion of the remedy selection process. Overall figures should be presented as part of the decision-making process. DOE's waste minimization policy should be included as an attachment or appendix to the EA as it would help the public understand the constraints, parameters, and guidance that DOE is operating under. Similarly, any other relevant cleanup

policies or orders (such as DOE Order 5400.5 and the moratorium on recycling metal from radioactive buildings) should also be included. Finally, DOE should include a wide range of options in its analysis of alternatives. For example, would it be cheaper to dispose of a large portion of radioactive buildings as radioactive waste rather than surveying, sampling, decontaminating, and repeating?"

Responses:

a. **Cleanup Levels:** This EA process did ask for public comment regarding cleanup levels and explains the process that will be used to select cleanup levels as requested. In fact, DOE analyzed the 1×10^{-6} additional lifetime cancer risk standard at the request of stakeholders. The opportunities and schedule for public input are provided in Section 1.4.

b. **Site Characterization:** Leach fields are identified as areas of concern and are addressed under the RCRA process. Leach fields are being sampled for chemical contamination under Department of Toxic Substances Control oversight and radiological contamination under Department of Health Services oversight. Past cleanup activities are not addressed in the EA because those activities are complete and are not the subject of DOE decisionmaking. Alternative 2 does address the additional soil remediation that would be required to meet the 1×10^{-6} cleanup standard.

c. **Unknown Areas of Contamination:** Continued sampling could detect new areas of radioactive or chemical contamination associated with DOE activities in Area IV. If so, these will be incorporated into the ongoing remediation process. If additional radiological contamination is found at levels substantially beyond that analyzed in the EA, the document would be modified with appropriate opportunity for public involvement.

d. **Remedy Costs:** Cost data is not provided because DOE believes that the EA should focus on potential environmental impacts rather than cost or technical issues. Rocketdyne's waste minimization policy is detailed in the *ETEC Waste Minimization and Pollution Prevention Awareness Plan*, available from DOE Oakland. This plan complies with DOE Order 5400.1, General Environmental Protection Program, and is available on the Internet (http://www.directives.doe.gov/pdfs/doe/doetext/oldord/5400/o54001c1.html). The specific alternative of disposing of large portions of radioactive buildings as radioactive waste was considered but not analyzed in detail, as discussed in Chapter 3.